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MEMO ENDORSED

April 4, 2018

The Honorable Ronnie Abrams
United States District Judge, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1506
New York, NY 10007

Re: *Nat'l Immigration Project v. U.S. Dep't of Homeland Sec.*, No. 18 Civ. 659 (RA)

Dear Judge Abrams,

We write to inform the Court that, since the parties filed their joint letter of March 29, 2018, they have reached agreement on a proposed briefing schedule on Plaintiffs' challenges to withholdings from the documents that Defendants have produced in response to Plaintiffs' Freedom of Information Act requests. The parties respectfully propose the following schedule: (1) Defendants will file a motion for summary judgment, including a *Vaughn* index or other appropriate supporting documents, by April 27, 2018; (2) Plaintiffs will cross-move for summary judgment and oppose Defendants' motion by May 18, 2018; (3) Defendants will file a joint opposition to Plaintiffs' motion and reply brief by May 28, 2018; and (4) Plaintiffs will file a reply brief by June 7, 2018. We thank the Court for considering this letter.

Respectfully submitted,

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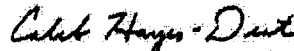
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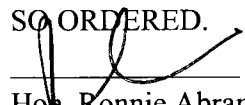
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Attorney for Defendants

As discussed at the conference on April 5, 2018, the Court hereby adopts the briefing schedule outlined in the letter above. Furthermore, with regard to the parties' disputes concerning a production schedule, the Court orders a schedule of 1,500 pages processed per month per agency, for the Departments of State and Homeland Security and United States Citizenship and Immigration Services.

SO ORDERED.


Hon. Ronnie Abrams

4/6/2018